

**United States Environmental Protection Agency  
Criminal Investigation Division  
Investigative Activity Report**

**Case Number**

1000-0438

**Case Title:**

Hanford Tank Farm Emissions

**Reporting Office:**

Seattle, WA, Area Office

**Subject of Report:**

Contact with [REDACTED]

**Activity Date:**

April 24, 2013

**Reporting Official and Date:**

[REDACTED]

**Approving Official and Date:**

[REDACTED]

Special Agent

Special Agent in Charge

25-APR-2013, Signed by [REDACTED]

25-APR-2013, Approved by [REDACTED]

Assistant Special Agent in Charge

**SYNOPSIS**

On April 24, 2013 U.S. Environmental Protection Agency (EPA) – Criminal Investigations Division (CID) Special Agent [REDACTED] spoke with Washington Department of Ecology hazardous waste inspector Jerry French regarding new information he obtained involving the designation, transportation and treatment of hazardous waste at the Hanford Nuclear Reservation (“Hanford Facility”) near Richland, WA. He advised that he recently conducted an inspection of containers at the Hanford Facility and was able to obtain additional information about wastes being shipped offsite to PermaFix Northwest, a third party Treatment, Storage and Disposal (TSD) facility. French provided the following information:

**DETAILS**

On April 24, 2013 U.S. Environmental Protection Agency (EPA) – Criminal Investigations Division (CID) Special Agent [REDACTED] spoke with Washington Department of Ecology hazardous waste inspector Jerry French regarding new information he obtained involving the designation, transportation and treatment of hazardous waste at the Hanford Nuclear Reservation (“Hanford Facility”) near Richland, WA. He advised that he recently conducted an inspection of containers at the Hanford Facility and was able to obtain additional information about wastes being shipped offsite to PermaFix Northwest, a third party Treatment, Storage and Disposal (TSD) facility. French provided the following information:

French advised that he was preparing to send a Freedom of Information Act (FOIA) request to the U.S. Department of Energy for any and all manifests associated with wastes being shipped from the Hanford Facility to PermaFix Northwest. He advised that Ecology needs the documents in order to determine the extent of mixed wastes leaving the Hanford Facility via “rolling road closures” to PermaFix.

French reported that he along with Joannette Biebesheimer conducted a compliance inspection at the Hanford Facility during the week of April 15, 2013. He advised that they inspected containers that are regulated under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). French explained that the containers are large “boxes” that are stored outside on concrete pad. He advised that the containers are filled with CERCLA regulated wastes that include solids, liquids and sludge.

French advised that the CERCLA wastes are managed by onsite contractor Hanford Closure. He reported that while reviewing Hanford Closure’s inspection paperwork [REDACTED] [REDACTED] the representative assigned to assist the Ecology inspection team began discussing the transportation of

This document contains neither recommendations nor conclusions of the EPA.  
It is the property of the EPA and is loaned to your agency;  
it and its contents are not to be distributed outside your agency.

**United States Environmental Protection Agency  
Criminal Investigation Division  
Investigative Activity Report**

**Case Number**

1000-0438

the CERCLA waste from the Hanford Facility. French stated that [REDACTED] stated that the CERCLA wastes are transported off-site via "rolling road closures" to PermaFix. According to [REDACTED], the public road system between the Hanford Facility and PermaFix is closed to traffic. French advised that while [REDACTED] was discussing the transportation of the waste between the facilities, PermaFix telephoned [REDACTED] to set up another transport.

French stated that the transportation of CERCLA waste is not exempt from the Department of Transportation (DOT) Hazardous Materials Regulations (HMR's).

French advised that Ecology is currently developing a position paper and a formal letter that will be sent to federal agencies addressing the transportation of hazardous waste from the Hanford Facility to PermaFix under "rolling road closures." French stated that the intent of the letter is to refer the matter to the appropriate federal agencies that may have an interest in investigating the issue further. French reported that when the letter and position paper are final, he will provide SA [REDACTED] with a copy.

This document contains neither recommendations nor conclusions of the EPA.  
It is the property of the EPA and is loaned to your agency;  
it and its contents are not to be distributed outside your agency.